THOMAS M. McELROY PROFESSIONAL ASSOCIATION ATTORNEY AT LAW 301 NORTH BROADWAY POST OFFICE BOX 1450 TUPELO, MISSISSIPPI 38802-1450



TEL: (662) 842-3723

McElroy Tup@aol.com

FAX: (662) 842-3744

June 10, 2004

Ms Debra Taylor Tate, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

RE:

Petition of Counce Natural Gas Company Rate Increase

Docket No. 04-00037

Dear Ms. Tate:

Please find enclosed the Responses of Counce Natural Gas Corporation to Discovery Request and Request for Production of Documents from the Office of the Attorney General, Consumer Advocate and Protection Division.

Please docket these responses in accordance with your usual procedures.

Sincerely

Thomas M. McElroy

IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: THE APPLICATION OF COUNCE

NATURAL GAS CORPORATION TO

INCREASE ITS RATES

DOCKET NO. 04-00034

COUNCE NATURAL GAS CORPORATION'S RESPONSES TO

FIRST SET OF DISCOVERY REQUEST, INTERROGATORIES AND REQUEST FOR
PRODUCTION BY THE CONSUMER ADVOCATE AND PROTECTION DIVISION OF
THE OFFICE OF THE ATTORNEY GENERAL

DISCOVERY REQUEST

DISCOVERY REQUEST NO. 1: Provide the dollar amount of dividends expected to be declared or paid out by Counce in the attrition year.

RESPONSE NO. 1: Zero Dollars (\$0.00).

DISCOVERY REQUEST NO. 2: Refer to Accountant's Report dated November 10, 2003. The income statement of the year ended September 30, 2003, indicates a net loss of \$44,546.00. The trial balance and the Form 1120 for the same time period both indicate a net loss of \$19,771.00. Please provide all adjustments and a narrative to reconcile the two numbers.

RESPONSE NO. 2: The accountant's report dated November 10, 2003, reflects the net loss of Counce Natural Gas Corporation only for the year ended September 30, 2003. The trial balance and the form 1120 for the same period is a consolidated report for both Counce Natural Gas Corporation and Burnsville Gas Company. The adjustments are reflected in the supporting documentation originally filed with the Petition seeking the rate increase and in the Responses to the Data Request on file with the Tennessee Regulatory Authority. Further, on the tax return the income tax basis of accounting is used. On the Rate Case filing, the basis of accounting is that prescribed by the Tennessee Regulatory Authority. The differences in the basis of accounting account for a part of the difference in the figures.

<u>DISCOVERY REQUEST NO. 3:</u> Has a financial audit ever been performed for Tumlinson Engineering Corporation or for Counce Natural Gas Corporation? If not, please explain why a financial audit has not been performed.

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RESPONSE NO. 3: No. An audit has not been requested nor required as of the date of filing **DISCOVERY REQUEST NO. 4:** Form 1120 the year ended September 30, 2001, shows Mr. Horton's salary at \$70,300.00. The next year his salary is shown as \$2,400.00 and for the year ended September 30, 2003, his salary is shown as \$19,256.00. Please explain the significant decrease in salary.

RESPONSE NO. 4: Mr. Horton's salary decreased for two reasons. First, the Counce Natural Gas Company division was losing money. Second, in 2002, the corporation began servicing a \$1,200,000 debt; therefore, there was less cash to pay officer salaries.

<u>DISCOVERY REQUEST NO. 5:</u> Provide all leak reports and emergency incidents related to service lines and mains. Describe all the cost over the past 3 years. Detail the cost incurred in repairing service lines and mains.

RESPONSE NO. 5: See attached Exhibits which are labeled as "Responses to Discovery Request No. 5".

DISCOVERY REQUEST NO. 6: Identify each person whom you expect to call as an expert witness at any hearing in this docket, and for each such expert witness:

- (A) Identify the field in which the witness is to be offered as an expert;
- (B) Provide complete background information, including the expert's current employer as well as his or her educational, professional and employment history, and qualifications withing the field in which the witness is expected to testify, and identify all publications written or presentations presented in whole or in part by the

witness;

- (C) Provide the grounds (including without limitations any factual basis), for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
- (D) Identify any matter in which the expert has testified (through deposition or otherwise), by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony
- (E) Identify the terms of the retention or engagement of each expert including byr not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;
- (F) Identify all documents or things shown to, delivered to, received from, relied upon, or prepared by any expert witness, which are related to the witness(es)' expected testimony in this case, whether or not such documents or things provided to that expert for review in connection with testimony and opinions; and
- (G) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert.

RESPONSE NO. 6: Identify each person whom you expect to call as an expert witness at any hearing in this docket, and for each such expert witness: Stephen Swetz

- (A) Financial accounting
- (B) Stephen Swetz has a bachelor's and master's degree in accounting at Mississippi

State University, has been employed with Watkins, Ward, and Stafford, PLLC (a public accounting firm located in northeast Mississippi) since January 1994, has been licensed as a certified public accountant since January 1996, but has not published or given any presentations concerning financial accounting during his career.

- (C) The conclusions that the witness has reached regarding the Counce Natural Gas

 Company rate case are based solely on the financial records that the witness has

 compiled from observations of financial related documents and inquiries with

 Michael and Candi Horton.
- (D) The witness has provided very limited testimony for the rate case that Counce Natural Gas Company had in 1998.
- (E) The accounting firm by which the witness is employed is to receive fees based on the actual number of hours that the witness will spend providing accounting and testimony services in this rate case proceeding.
- (F) All documents and data on which the witness will testify have been included in the original filing and all subsequent data request filings provided to the Tennessee Regulatory Authority
- (G) All exhibits have been included in the original filing and all subsequent data request filings provided to the Tennessee Regulatory Authority.

DISCOVERY REQUEST NO. 7: Provide all material, provided to, reviewed by, used by or produced by any expert or consultant retained by Counce to testify or to provide information from which another expert will testify concerning this case, including all work papers.

RESPONSE NO. 7: All materials used by any expert or consultant retained by Counce is contained with the Responses to Data Requests from the Tennessee Regulatory Authority and the Responses to Discovery Request received from the Consumer Advocate Division of the Tennessee Attorney General

<u>DISCOVERY REQUEST NO. 8:</u> Produce a copy of all articles, journals, books or speeches written by or co-written by any of Counce's expert witnesses, whether published or not.

RESPONSE NO. 8: None. However, if additional experts are employed, this response will be updated as may be relevant

DISCOVERY REQUEST NO. 9: State whether Counce has received any customer complaints of any kind for the period from January 12, 2000, to present, including, but not limited to, complaints regarding billing and payment, billing disputes, interruption of service, service connection, and disconnection or termination of service. For each such complaint, state the name and billing address of the complaining customer, the date or approximate time frame the Company received the complaint, the nature of the complaint, the action the company has taken to address or resolve the complaint, and the current disposition of the complaint

RESPONSE NO. 9: None.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1: Produce all copies of all documents provided to, reviewed by or produced by any expert or consultant retained by Counce to testify or to provide information from which another expert or consultant will testify concerning this case.

RESPONSE NO. 1: All documentation relied upon by Steven J. Swetz has been produced either in response to Data Requests from the Tennessee Regulatory Authority or Discovery Requests from

the Consumer Advocate Division of the Tennessee Attorney General's Office.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2: Produce a copy of all work papers of Counce's proposed experts, including but not limited to: file notes, chart notes, tests results, computations, interview and/or consult notes, and all other file documentation that any of Counce's expert witnesses in any way used, created, generated or consulted in connection with the evaluation, conclusions and opinion in this matter.

RESPONSE NO. 2: See response to Request for Production No. 1.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 3: Produce a copy of all trade articles, journals, treatises and publications of any kind in any way utilized or relied upon by any of Counce's proposed expert witnesses in evaluating, reaching conclusions or formulating an opinion in this matter.

RESPONSE NO. 3: None.

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REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4: Produce a copy of all documents which relate or pertain to any factual information provided to, gathered by, utilized or relied upon by any of Counce's proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter.

RESPONSE NO. 4: See response to Request for Production No. 1.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 5: Produce a copy of any exhibits to be used as a summary of or support for the testimony or opinions provided by any of Counce's proposed expert witnesses.

RESPONSE NO. 5: See response to Request for Production No. 1.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6: Produce copies of any and all documents referred to or relied upon in responding to the Consumer Advocate's discovery request

RESPONSE NO. 6: See response to Request for Production No. 1.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 7: Produce copies of any and all documents referred to or relied upon in responding to the CAPD's discovery request.

RESPONSE NO. 7: See response to Request for Production No. 1.

Respectfully submitted,

COUNCE NATURAL GAS CORPORATION

THOMAS M MCELROY

Attorney for Counce Natural Gas Co

ACKNOWLEDGMENT

Mike Horton, President of Counce Natural Gas Corporation, and Candy Horton,

Secretary of Counce Natural Gas Corporation, who being first duly sworn, and state that the
responses of Counce Natural Gas Corporation to the Discovery Requests of the Consumer Protection

Division of the Office of the Attorney General are true and accurate to the best of their knowledge
and belief.

Dated this the 10th day of June, 2004.

MIKE HORTON, PRESIDENT

CANDY HORTON, SECRETARY

NOTARY WOTARY WOTARY

Sworn to and subscribed before me, Bethany M. Dalton, this the 10th day of June, 2004

MY COMMISSION EXPIRES: / // // (

CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid to:

Ms. Debra Taylor Tate Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

Shilina B. Chatterjee
Assistant Attorney General
Consumer Advocate and Protection Division
P. O. Box 20207
Nashville, TN 37202

Dated: June 10, 2004

THOMAS M. MCEL**RO**Y

TENNESSEE REGULATORY AUTHORITY

Deborah Taylor Tate, Chairman Pat Miller, Director Sara Kyle, Director Ron Jones, Director



460 James Robertson Parkway Nashville, Tennessee 37243-0505

April 22, 2004

Mr. Mike Horton Counce Natural Gas System P O Box 285 Burnesville, MS 38833-0285

Re: Report of Natural Gas Safety Inspection #04-079

Dear Mr. Horton:

On April 6, 2004, a representative of the Tennessee Regulatory Authority Gas Pipeline Safety Division conducted an inspection of your gas system and found no violations of the Code of Federal Regulations, Title 49, Transportation of Natural and Other Gas by Pipeline, Minimum Federal Safety Standards. A copy of the Natural Gas Safety Inspection Report Number 04-079 is enclosed for your information and file.

If you have any questions pertaining to this report, please do not hesitate to contact us at 1-800-342-8359, extension 184. Thank you for your cooperation in matters relative to gas pipeline safety.

Sincerely,

Glynn Blanton, Chief

Gas Pipeline Safety Division

GB/vnm

Enclosure

c. Clift Phillips

TENNESSEE REGULATORY AUTHORITY

Deborah Taylor Tate, Chairman Pat Miller, Director Sara Kyle, Director Ron Jones, Director



460 James Robertson Parkway Nashville, Tennessee 37243-0505

REPORT OF NATURAL GAS SAFETY INSPECTION #04-079

OPERATOR: Counce Natural Gas - Counce, Tennessee

PERSON(S) CONTACTED: Mike Horton - Manager

INSPECTION DATE: 4/6/04 TRA ENGINEER: Clift Phillips

Any questions pertaining to this report may be directed to the above address or by telephoning (615) 741-2844 ext. 187. (Call toll-free within Tennessee at 1-800-342-8359, extension 187.)

1. <u>PURPOSE OF INSPECTION</u>: To perform an Operator Qualification (OQ) inspection of the Counce Natural Gas for compliance with the Minimum Federal Safety Standards (MFSS) Part 192 Section N.

2 VIOLATION(S) OF THE MINIMUM FEDERAL SAFETY STANDARDS:

A <u>Violation(s) Cited this Inspection</u>: **None**

B Violation(s) Previously Cited: None

C. Violation(s) Closed this Inspection: None

3 OBSERVATIONS, COMMENTS, AND RECOMMENDATIONS:

The operator's OQ plan is an off-the-shelf plan purchased from Work and Greer. The operator has modified parts of the plan to be specific to the operator's tasks and procedures. The covered tasks are identified in Appendix B of the plan. The reevaluation range of the covered tasks has been set between one to three years. The welding tasks must be reevaluated every year, while all the other tasks have a 3 year reevaluation period. Employees take training courses with written tests and perform field evaluations to become qualified for a covered task. Work performance history review is not allowed to be the sole means of qualification. Counce Natural Gas has one covered employees and one contract company that perform covered tasks. Currently all the employees are qualified to perform tasks that are listed in their job description.

Several items were identified during this inspection that should be addressed. These issues will be discussed by the protocol they were identified with.

Protocol 1.04 The operator stated and had documentation that training is performed before an evaluation is taken, but specific information about training is not stated in the OQ plan. The operator should state in the OQ plan the training methods used for each task. The plan did establish the person responsible for scheduling training.

Protocol 2.02 The operator's OQ plan does not specifically describe the evaluation methods for each task. The plan should state the evaluations an employee must take to be considered qualified. The documentation of these evaluations should be task and person specific.

Protocol 3.02 The operator's OQ plan does not discuss limitations on tasks that can be performed by non-qualified individuals (i.e. welding).

Protocol 4.02 The operator could not produce a list of abnormal operating conditions AOC's for each task. The operator's OQ plan does not address how the AOC's are to be addressed to the employees for the purpose of qualifying (i.e. training).

Protocol 5.02 The reevaluation interval is stated in the OQ plan to be within 3 years. However the plan does not address specifically how the reevaluation will be performed. The operator should develop a method for reevaluating individuals and state this method in the OQ plan.

Protocol 6.01 The operator should develop a procedure to evaluate the OQ plan's effectiveness. This procedure should be written into the OQ plan

Protocol 8.01 The operator's OQ plan should specifically state the steps preformed when a change is made. Currently the plan generically outlines this process.

A field evaluation was not performed because the operator was not performing any coved tasks.

Thank you for your cooperation concerning natural gas pipeline safety.

4 <u>ACTION REQUIRED BY OPERATOR</u>: Continue to operate and maintain your system within the guidelines of the Minimum Federal Safety Standards Comply with all recommendations and requirements listed above.

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NATURAL GAS LEAK SURVEY REPORT

Tri-State Meter And Regulator Service, Inc was hereby retained by Counce Gas System to conduct a survey of the natural gas pipeline and services described in the following report

This leak survey was conducted in accordance to the u.s. department of transportation and office of pipeline safety specifications

This survey was conducted exclusively on pipeline and services under the guidance of Scott Horton. All surveillance was conducted with their knowledge of pipeline and service locations.

Survey locations are listed as follows

Survey location Counce. Tn

Start date 9/26/03 End date 9/26/03 Number of days 1

Guide provided Yes number of leak cases 9

Leak detector type used: Heath Detecto-Pak III

Leak class breakdown

Class 1 0 Class 2: 0 Class 3 9

Residential services inspected Yes
Commercial services inspected Yes
Industrial services inspected Yes
Main line inspected Yes
All services checked Yes
All services checked Yes
All main line checked Yes

Number of main line leaks: 0

Survey Conducted By Joe Quillin Assistant None

Comments all leaks located were marked with yellow paint. Overall condition of pipeline and services were found in average condition. This survey covered the entire gas system.

Recommendations: a licensed plumber should examine the leaks found in this report it will be their determination as to whether faulty equipment or pipeline should be replaced or repaired



Leak grade interpretation no.1 leak: 66-100%

No.2 leak: 6-65% No.3 leak: trace -5%.

No.1 leaks: should be repaired immediately.

No.2 leaks: repair soon.

No.3 leaks: repair or check each year.

Factors determining the grades of leaks are, concentration, proximity to buildings, gas pressure, area of spread, vegetation damage, distance from source and gas in underground structures

In those cases where a written gas company procedure was not available, assignment of grade is to establish repair priority

All leaks judged to be an imminent hazard were promptly reported regardless of procedure or classification

Pinpointing leaks shown on report are centered and should be carefully tested above all adjacent lines before excavation. Maximum leak indications are usually above the source

Tri-State N	Tri-State Meter and Regulator Services, Inc.	2865 Rudder Road - Me	Memphis, Tennessee 38118	see 38118 -	- 901.363.0377	
Address	TVA LODGES	City/ County	COUNCE / MCNAIRY	MCNAIRY	State/ Dist.	٦ ا
			Case #	1	Date	09/26/03
		Z	Classification	Grade 1	Grade 2	X Grade 3
		>	Meter #			Inside
		7			×	Outside
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		{ }	#2 HP Cock	h		
		<	X #3 Regulator	<u>_</u>		
		ഗ	#4 LP Cock	•	#6 #7	
			#5 Inlet Loop	#3		
			#6 Inlet Cap	#) 	# Z
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			#7 Outlet Cap			#8
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			#8 Outlet Loop	#2		
			#9 Fuel Line	#		,
			Fitting	} }	-	,
			#10 Gas Meter			
			#11 Index			
			#12 Fuel line			

Detection	Location	ION	Soil Sub	CGI / EGD	Pressure	Surface	Pipe	Size	Weather Conditions
X Mobile FI	inside Building	Main	Rock	% Gas	SP (0-1)	(Grass	Steel	5- 75	X Suppy
Thomas Darel.	< O	,)		,		0.00		Aumy
riame rack	A Outside Building	Service	Cinder	LEL	IP (1-30)	Dî.	× PE	1-1 25	Overcast
Visual Vegetion	Manhole	Tap	Clay	UEL	(MP (31-60)	Asphalt	Cast Iron	15.25	China
CC1 / ECD	11	1/-1						. 0 1	Cicuoy
CGI / EGD	Underground	valve	Loam	Mdd	HP (61-99 9)	Concrete	CSST	X 2 5-3	Misting
Odor	Atmosphere	X Meter Center	Sand	Other	XHP (100-399)	Sidewalk	Other	3.5-4	Dany
Other	Other	224	A III. Duran		VVIII / 100 000				1,44117
Clier	Other	Ciner	Alluvian		XXHP (400-900)	Other	Size	45-6	Hot(85-100)
								8-12	Coldinan
									OCIGIO-40/

•	Remarks			Other	Material Defect	Construction Defect X Fitting	Outside Force	Corrosion	Leak Cause
	LEAK LOCATED @ INLET REGULATOR FLANGES	Other	ap Connection	Regulator	Drip	X Fitting	Valve	Pipe	Component & Explanation
	REGULATOR FLANGES		Other	Customer Pipe	X Meter Set	Service	Main	Transmission	Part of System
			Other	Plastic	Copper	Ductile Iron	Cast Iron	X Steel	Pipe & Size
					Industrial	X Commercial	Rural	Residential	Location Area
		Positive Negative	Date Rechecked	Date Repaired	Coated	Bare	Number Of Leaks		Repair Data

																			Address	Tri-State M	
														,					BOAT STORAGE & CABINS - HWY 57	ri-State Meter and Regulator Services, Inc.	
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											0,		7	m \ \ \	 7 		_		City/ County	Road - Mer	
#12 Fuel line	#11 Index	#10 Gas Meter	Fitting	#9 Fuel Line	#8 Outlet Loop	& Swivel	#7 Outlet Cap	& Swivel	#6 Inlet Cap	X #5 Inlet Loop	#4 LP Cock	#3 Regulator	#2 HP Cock	#1 Riser		Meter #	Classification	Case#		2865 Rudder Road - Memphis, Tennessee 38118 - 901.363.0377	
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Detection	Location	ion	Soil Sub	CGI / EGD	Pressure	Surface	Pipe	Size	Weather Conditions
X Mobile FI	Inside Building	Main	Rock	% Gas	SP (0-1)	Grass	Steel	5- 75	X Supra
The Deal.	<	2	,						> Journal
Flame Pack	A Outside Building	Service	Cinder	LEL	IP (1-30)	× Din	X PE	1-1 25	Overcast
Visual Vegetion	Manhole	Tap	Clav	UEL	X MP (31-60)	Asphalt	Cast Iron	1707	
001/500		1/-1	•					-010	Cloudy
רפו / בפט	Underground	valve	Loam	MAG	HP (61-99 9)	Concrete	CSST	253	Misting
2	Atmosphoro.	1 Total Control	0000	2	VI ID (400 000)				
Cac	Armosphere	A Meter Center	Sand	Other	XHP (100-399)	Sidewalk	Other	35-4	Rainy
Other	Other	Other	Alluvian		XXHP (400-900)	Other	Size	45-6	Hot(85-100)
									1.00,00
								8-12	Cold(0-40)

L	Remarks:			Other	al Defect	efect			Leak Cause
LEAR LUCATED (@ INLET METER LOOP	EAK I OCATED @ INI ET I	Other	Tap Connection	Regulator	Crip	X ritting	Valve	Pipe	Component & Explanation
יהות בסטע יים היא בסטע	ETED I OOD		Other	Customer Pipe	X Meter Set	Service	Main	Transmission	Part of System
			Other	Plastic	Copper	Ductile Iron	Cast Iron	X Steel	Pipe & Size
					Industrial	X Commercial	Rural	Residential	Location Area
		Positive	Date Rechecked	Date Repaired	Coated	Bare	Number Of Leaks		Repair Data
	A USB	Negative							Data

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Tri-State Meter and Regulator Services, Inc.	Address																		
ervices, Inc.	6210 HWY 57														٠				
2865 Rudder Road - Me	City/ County		Z	\triangleright	{ } 7	₩	4 >	<	ഗ										
Memphis, Tennessee 38118 - 901.363.0377	COUNCE / MCNAIRY	Case #	Classification	Meter #		X #1 Riser	#2 HP Cock	#3 Regulator	#4 LP Cock	#5 Inlet Loop	#6 Inlet Cap	& Swivel	#7 Outlet Cap	& Swivel	#8 Outlet Loop	#9 Fuel Line	Fitting	#10 Gas Meter	#11 Index
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Detection	Location	ion	Soil Sub	CGI / EGD	Pressure	Surface	Pipe	?!	W4101-11
X Mobile FI								Size	Weather Condition
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	Inside Building	Main	Rock	% Gas	Ш	X Grass	Steel		VVeatner Condition
	Inside Building Outside Building	Main Service	Rock	% Gas	Ш	X Grass	X PE		X Sunny Overcast
Visual Vegetion	Inside Building Outside Building Manhole	Main Service Tap	Rock Cinder	% Gas LEL UEL	×	X Grass Dirt Asphalt	Steel X PE Cast Iron		Weather Condition X Sunny Overcast Cloudy
Visual Vegetion CGI / EGD	Inside Building Outside Building Manhole Underground	Main Service Tap Valve	Rock Cinder	% Gas LEL UEL PPM	×	X Grass Dirt Asphalt Concrete	Steel X PE Cast Iron CSST		Weather Condition X Sunny Overcast Cloudy Misting
Visual Vegetion CGI / EGD Odor	Inside Building Outside Building Manhole Underground X Atmosphere	Main Service Tap Valve X Meter Center	Rock Cinder X Clay Loam Sand	% Gas LEL UEL PPM Other	×	X Grass Durt Asphalt Concrete Sidewalk	Steel X PE Cast Iron CSST Other		Weather Condition X Sunny Overcast Cloudy Misting Rainy
Visual Vegetion CGI / EGD Odor Other	Inside Building Outside Building Manhole Underground X Atmosphere Other		Rock Cinder X Clay Loam Sand Alluvian	% Gas LEL UEL PPM Other		X Grass Dirt Asphalt Concrete Sidewalk Other	Steel X PE Cast Iron CSST Other Size		Weather Conditions Sunny Overcast Cloudy Misting Rainy Hot(85-100)

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	Remarks:			Other	Material Defect	erect	Щ.	Corrosion	Leak Cause
	LEAK LOCATED @ 1"x3/4" BELL REDUCER ON INLET RISER	Other	Tap Connection	Regulator	2 2	X Fitting	Valve	TDE	Component & Explanation
	BELL REDUCER ON IN		Other	Customer Pipe	X Meter Set	Service	Main	Transmission	Part of System
-	LET RISER		Other	Plastic	Copper	Ductile Iron	Cast Iron	X Steel	Pipe & Size
					Industrial	Commercial	Rural	X Residential	Location Area
		Positive	Date Rechecked	Date Repaired	Coated	Bare	Number Of Leaks	2	Repair Data
	rac garage	Negative							Data

Tri-State Meter and Regulator Services, Inc.	Address																		
ulator Services, Inc.	6140 HWY 57													•					
2865 Rudder Road - Memphis, Tennessee 38118 - 901.363.0377	City/ County		Z		V ← I ←	45	· <	w								,			
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see 38118 -	COUNCE / MCNAIRY	4,5	Grade 1	(R-275) 1579439	,	h	<u>-</u> -(#3	#44	#3)		#2	#1	ļ			
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7	Τ̈́	09/26/03	X Grade 3	Inside X Outside	#12					<u></u>	I k	#9	#10						

	Other	Cdor	Cel / EGD	Visual Vegetion	Flame Fack	X Mobile FI	Detection
	Other	X Atmosphere	Underground	Manhole	Outside Building	Inside Building	Location
	Other	X Meter Center	Valve	lap	Service	Main	on
	Alluvian	Sand	Loam	X Clay	Cinder	Rock	Sub
		Other	PPM	UEL	LEL	% Gas	CGI / EGD
	XXHP (400-900)	XHP (100-399)	HP (61-99 9)	(MP (31-60)	IP (1-30)		Pressure
	Other	Sidewalk	Concrete	Asphalt	Din	X Grass	Surface
	Size	Other	CSST	Cast Iron	X PE	Steel	Pipe
8-12	4 5-6	3 5-4	2 5-3	1 5-2 5	X 1-1 25	5- 75	Size
Cold(0-40)	Hot(85-100)	Rainy	Misting	Cloudy	Overcast	X Sunny	Weather Conditions

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Leak Cause	Component & Explanation	Part of System	Pipe & Size	Location Area	Repair Data
Corrosion	Pipe	Transmission	X Steel	X Residential	
Outside Force	X Valve	Main	Cast Iron	Rural	Number Of Leaks
Construction Defect	Fitting	Service	Ductile Iron	Commercia	Baro
Material Defect	Drip	Weter Set	Carpar		Daid
Material Defect	0.5	V Meter Set	Copper	industrial	Coated
Other	X Regulator	Customer Pipe	Plastic		Date Repaired
	Tap Connection	Other	Other		Date Rechecked
	Other			1	+
Remarks:	## I EAK I OCATED @ INII ET SHITT OEE WALVE				i deganye
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#5 LEAK LOCAT	LEAK LOCATED @ REGULATOR				
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#12 Fuel line	#11 Index	#10 Gas Meter	Fitting	#9 Fuel Line	#8 Outlet Loop	& Swivel	#7 Outlet Cap	& Swivel	#6 Inlet Cap	#5 Inlet Loop	#4 LP Cock	#3 Regulator	X #2 HP Cock	#1 Riser	Meter #	14 4 4	Classification	Case #	COUNCE / MCNAIRY	Memphis, Tennessee 38118 - 901.363.0377
				#	#2			#3	#4	#5		r_{	h		(AMERICA		Grade 1	6	MCNAIRY	see 38118 -
			-	-						_	#6 #7				(AMERICAN) 536458/	N 500 1505	Grade 2	Date	State/ Dist	901.363.037
						#10	#9		ik OC					#12	X Outside	Inside	X Grade 3	09/26/03	NI	7

Г	L			Ι	I	×	
	Other	Cdor	CGI / EGD	Visual Vegetion	Flame Pack	X Mobile FI	Detection
	Other	Atmosphere	Underground	Manhole	X Outside Building	Inside Building	Location
	Other	X Meter Center	Valve	lap	Service	Main	ion
	Alluvian	Sand	Loam	X Clay	Cinder	Rock	Soil Sub
		Other	PPM	L	LEE	% Gas	CGI / EGD
	XXHP (400-900)	XHP (100-399)	HP (61-99 9)	X MP (31-60)	IP (1-30)	SP (0-1)	Pressure
	Other	Sidewalk	X Concrete	Asphalt	Dirt	Grass	Surface
	Size	Other	CSST	Cast Iron	PE	Steel	Pipe
8-12	45-6	35-4	X 2 5-3	15-25	1-1 25	5- 75	Size
Cold(0-40)	Hot(85-100)	Rainy	Misting	Cloudy	Overcast	X Sunny	Weather Conditions

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Tri-State M	Tri-State Meter and Regulator Services, Inc. 130 PREACHER RD	2865 Rudder Road - Men	emphis, Tennessee 38118 - 901.363.0377 ty	see 38118 -	S 8	01.363.0377 State/ Dist
				7,8	Date	
		Z	Classification	Grade 1	Grade 2	X Grade 3
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		WALLY E	#1 Riser			Ļ
		75	X #2 HP Cock	h		
		<	X #3 Regulator	<u>-</u> -[
		S	#4 LP Cock	1	#6 #7	
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			#10 Gas Meter			1
			#11 Index			
			#12 Fuel line		-	

Detection	Location	ion	Soil Sub	CGI / EGD	Pressure	Surface	Pipe	Size	Weather Conditions
X Mobile FI	Inside Building	Main	Rock	% Gas	SP (0-1)	Grass	Steel	5- 75	2
	× 5	,							041117
Flame Pack	X Outside Building	Service	Cinder	LEL	IP (1-30)	X Dirt	X PE	X 1-1 25	Overcast
Visual Vegetion	Manhole	Тар	X Clay	UEL	X MP (31-60)	Asphalt	Cast Iron	15-25	Cloud
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Other	Otner	Other	Alluvian		XXHP (400-900)	Other	Size	45-6	Hot(85-100
								8-12	Cold(0-40

' ' '

Leak Cause	Component & Explanation	Part of System	Pipe & Size	Location Area	Repair Data	Data
Corrosion	Pipe	Transmission	X Steel	X Residential		
Outside Force	X Valve	Main	Cast Iron	Rural	Number Of Leaks	
Construction Defect	Fitting	Service	Ductile Iron	Commercial	Rare	
Material Defect		X Meter Set	Copper	Industrial	Coatod	
		2	2		Coaled	
Other	X Regulator	Customer Pipe	Plastic	-	Date Repaired	
	lap Connection	Ctner	Other		Date Rechecked	
	Other				Positive	Negative
Remarks:	#7 LEAK LOCATED @ INLET SHUT OFF VALVE	T SHUT OFF VALVE				
#8 LEAK LOCATE	#8 LEAK LOCATED @ REGULATOR VENT					
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#12 Fuel line	#11 Index	#10 Gas Meter	Fitting	#9 Fuel Line	#8 Outlet Loop	& Swivel	#7 Outlet Cap	& Swivel	X #6 Inlet Cap	#5 Inlet Loop	#4 LP Cock	#3 Regulator	#2 HP Cock	#1 Riser		Meter #	Classification	Case #	COUNCE / MCNAIRY	Memphis, Tennessee 38118 - 901.363.0377
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	Other Other Alluvian	Atmosphere X Meter Center	EGD	euori Marinole Tap A Clay	A Curside pulluling Cervice Cinder	Y Outside Duilding Main ROCK	tion Location Soil Sub C
	XXHP (400-900)	XHP (100-399)	HP (61-99 9)	X MP (31-60)	IF (1-30)	SP (0-1)	
	Other	Sidewalk	Concrete	Asphalt	X Dirt	Grass	Surface
	Sıze	Other	CSST	Cast Iron	X PE	Steel	Pipe
8-12	4 5-6	35-4	2 5-3	15-25	X 1-1 25	5- 75	Size
Cold(0-40)	Hot(85-100)	Rainy	Misting	X Cloudy	Overcast	Sunny	Weather Conditions

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	, ,		Remarks.		-	Other	Material Defect	efect	Outside Force	Corrosion	Leak Cause
			LEAK LOCATED @ INLET CAP & SWIVEL	Cale	Tap Connection	Regulator	Lrip	× Friting	Valve	Pipe	Component & Explanation
			AP & SWIVEL		Other	Customer Pipe	X Meter Set	Service	Main	Transmission	System
					Other	Plastic	Copper	Ductile Iron	Cast Iron	X Steel	Pipe & Size
							Industrial	Commercial	X Rural	Residential	Location Area
				Positive	Date Rechecked	Date Repaired	Coated	Bare	Number Of Leaks	2	Repair Data
				Negative							Data



Leak grade interpretation no.1 leak: 66-100%

No.2 leak: 6-65% No.3 leak: trace -5%.

No.1 leaks: should be repaired immediately.

No.2 leaks: repair soon.

No.3 leaks: repair or check each year.

Factors determining the grades of leaks are, concentration, proximity to buildings, gas pressure, area of spread, vegetation damage, distance from source and gas in underground structures.

In those cases where a written gas company procedure was not available, assignment of grade is to establish repair priority

All leaks judged to be an imminent hazard were promptly reported regardless of procedure or classification

Pinpointing leaks shown on report are centered and should be carefully tested above all adjacent lines before excavation. Maximum leak indications are usually above the source.



2865 RUDDER ROAD • P O BOX 18061 • MEMPHIS, TENNESSEE 38118 • PHONE 363-0377 LEAKAGE INSPECTION - LOCATION REPORT Page No._ Lettle ADDRESS Field Case No. 8-2-07 DISTRICT NORTH GRADE OF CASE SUMMARY GRADE 1 GRADE 2 GRADE 3 METER SET Meter No . (IF INSPECTED) INSIDE | OUTSIDE | X - DENOTES ESTIMATED LEAK LOCATIONS LEAK DATA DETECTED BY COLLECTING PROBABLE SOURCE SOIL VENTED CG | TEST PRESSURE SURFACE PIPE & SIZE Mobile Flame Pack In Building Main Rock Gay % low 53401 lown Near Bldg Flome Pack Service Cipdon KEL % 1 7 Soil Plastic Visual/Vegetation In Man Hole Service Tap Clay PPM High Paved Cast Iron Combustible Meter In Soil Valve loam Negative Tronsmission Other Other Odor In Air Meter Set Sand Other Other Other Other REMARKS - VEGETATION DAMAGE MUNE AREA LOCATION COMMERCIAL [INDUSTRIAL [RESIDENTIAL [RURAL [**REPAIR DATA** LEAK CAUSE COMPONENT & EXPLANATION PART OF SYSTEM PIPE & SIZE REPAIR DATA Corrosion Pipe Transmission Steel Number of Leeks Outside Force Valve Moin Cast Iron Bare Construction Defect Fifting Service Ductile from Coated Material Failure Drip Date Repaired Mater Set Copper Other Regulator Customer Pipe Plastic Date Rechecked Tap Connection Other Other Positive | Negative | Other REMARKS



NATURAL GAS LEAK SURVEY REPORT

Tri-State Meter And Regulator Service, Inc was hereby retained by Town of Counce to conduct a survey of the natural gas pipeline and services described in the following report.

This leak survey was conducted in accordance to the u.s. department of transportation and office of pipeline safety specifications.

This survey was conducted exclusively on pipeline and services under the guidance of Scott Horton . All surveillance was conducted with their knowledge of pipeline and service locations

Survey locations are listed as follows

Survey location. Counce, Tn

Start date 5/28/02End date 5/28/02 Number of days 1

Guide provided: Yés number of leak cases 5

Leak detector type used: Heath Detecto-Pak III

Leak class breakdown

Class 1: 0 Class 2: 0 Class 3.5

Residential services inspected No
Commercial services inspected Yes
Industrial services inspected Yes
Main line inspected Yes
Main line inspected Yes
All services checked Yes
All main line checked: Yes

Number of main line leaks: 1

Survey Conducted By Charles Raines Assistant, None

Comments. all leaks located were marked with yellow paint. Overall condition of pipeline and services were found in average condition. This survey covered the buisness section along hwy 57, all churches and public state parks



Recommendations: a licensed plumber should examine the leaks found in this report it will be their determination as to whether faulty equipment or pipeline should be replaced or repaired

Leak grade interpretation no.1 leak: 66-100%

No.2 leak: 6-65% No.3 leak: trace -5%.

No.1 leaks: should be repaired immediately.

No.2 leaks: repair soon.

No.3 leaks: repair or check each year.

Factors determining the grades of leaks are, concentration, proximity to buildings, gas pressure, area of spread, vegetation damage, distance from source and gas in underground structures

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All leaks judged to be an imminent hazard were promptly reported regardless of procedure or classification

Pinpointing: leaks shown on report are centered and should be carefully tested above all adjacent lines before excavation Maximum leak indications are usually above the source



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2865 RUDDER ROAD • P O BOX 18061 • MEMPHIS, TENNESSEE 38118 • PHONE. 363-0377 LEAKAGE INSPECTION - LOCATION REPORT Page No.___ Field Case No. ADDRESS Doie_ 5-28-02 CITY/COUNTY_ DISTRICT HORTH GRADE OF CASE SUMMARY GRADE 1 GRADE 2 . GRADE 3 METER SET Meler No -IN INSPECTEDI 0 INSIDE - OUTSIDE -X - DENOTES ESTIMATED LEAK LOCATIONS LEAK DATA STATIACE PIPE & SIZE VINTED C G I TEST PRESSURE DETECTED BY COLLECTING PROPERTY SOURCE In Building 1900% Steel Mobile Flame Pock | Hoin Low Lock Plastic Cindon Soil Flome Pock |Nent Bidg | Sores TEL S 1 -| Cast Iron Pared ✓ wal/Vegetation In Man Hale Sarvice Top CKY 18 5 M High Ciner Other Combustible Meter In Seil Valve. Negotive Trommusion Loom Cdor In Air Muter Set Sond Other 101701 Other Other REMARKS - VEGETATION DAHAGE RESIDENTIAL | AREA LOCATION. COMMERCIAL CT INDUSTRIAL P RURAL 🔲 REPAIR DATA LEAK CAUSE REPAIR DATA PART OF SYSTEM PIPE & SIZE COMPONENT & EXPLANATION Number of Louis Corresion Transmission Steel Ounide force Valve Mein Sere Cast Iren Construction Delect Fifting Service Ductile Iron Cooled Moterial Failure Maler Set Date Repaired 2000 Copper Other Date Rechecked Regulator Customer Pipe Plante Top Connection Other Pesitive | Negative | Other REMARKS



NATURAL GAS LEAK SURVEY REPORT

Tri-State Meter And Regulator Service, Inc was hereby retained by Town of Counce to conduct a survey of the natural gas pipeline and services described in the following report.

This leak survey was conducted in accordance to the u.s. department of transportation and office of pipeline safety specifications .

This survey was conducted exclusively on pipeline and services under the guidance of Mike Horton. All surveillance was conducted with their knowledge of pipeline and service locations

Survey locations are listed as follows

Survey location Counce, Tn.

Start date 8-2-2001 End date 8-2-2001 Number of days:1

Guide provided No number of leak cases 1

Leak detector type used: Heath Detecto-Pak III

Leak class breakdown

Class 1:0

Class 2: 0

Class 3.1

Residential services inspected. No
Commercial services inspected: Yes
Industrial services inspected NO
Main line inspected
Yes
All services checked No
All services checked No
All services checked No

Number of main line leaks: 1

Survey Conducted By 'Charles Raines Assistant: None

Comments: all leaks located were marked with yellow paint. Overall condition of pipeline and services were found in average condition. Survey consisted of the buisness district only. This covered the main line running down hwy 57.

Recommendations: a licensed plumber should examine the leaks found in this report it will be their determination as to whether faulty equipment or pipeline should be replaced or repaired.